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EX PARTE OR LATE FILED



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VIA COURIER

EX PARTE

FILED/ACCEPTED

MAY - 2 2008

Federal Communications Commission
Office of the Secretary

May 2, 2008

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to 47
U.S.C. § 160(c) in the Seattle Metropolitan Statistical Area, WC Docket No. 07-
97*

Dear Ms. Dortch:

Qwest Corporation hereby submits the attached *ex parte* and request for confidential treatment (pursuant to the Second Protective Order) of certain highly confidential information included in the *ex parte*, in the above-captioned proceeding.

One copy of the non-redacted version is being submitted; and two copies of the redacted version are being submitted. For both the redacted and non-redacted versions, an extra copy is provided to be stamped and returned to the courier. Both the redacted and non-redacted versions of the *ex parte* are being served on Staff of the Commission's Wireline Competition Bureau as indicated below. This cover letter does not contain any confidential information.

If you have any questions concerning this submission, please contact me using the information above.

Sincerely,

/s/ Melissa E. Newman

Attachments

No. of Copies rec'd 0 + 1
LH ABCDE

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May 2, 2008

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cc: (via e-mail)

Denise Coca (denise.coca@fcc.gov)

Jeremy Miller (Jeremy.miller@fcc.gov)

Tim Stelzig (tim.stelzig@fcc.gov)

Gary Remondino (two hard copies of the non-redacted version & via
gary.remondino@fcc.gov)

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Qwest
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Phone 303-383-6653
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Daphne E. Butler
Corporate Counsel

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EX PARTE

May 2, 2008

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Seattle Metropolitan Statistical Area*, WC Docket No. 07-97

Dear Ms. Dortch:

Qwest Corporation (“Qwest”) hereby requests highly confidential treatment of certain information included in the associated *ex parte*. The highly confidential information includes: boundaries of Qwest’s Seattle Metropolitan Statistical Area (“MSA”) retail access line counts by wire center and line type, business retail access service lines by wire center and capacity; the number of retail private line facilities in service by wire center and capacity; and the volumes of unbundled network elements and special access services by capacity or line type provided by Qwest to individual competitive local exchange carriers at the MSA level.

The highly confidential information is submitted pursuant to the June 1, 2007 Second Protective Order (22 FCC Rcd 10134, DA 07-2293) in WC Docket No. 07-97. As required by the Second Protective Order the highly confidential information (that is, the non-redacted version) is marked **HIGHLY CONFIDENTIAL – SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 07-97 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**. Pursuant to the Second Protective Order, Qwest requests that the non-redacted version of this *ex parte* (containing highly confidential information) be withheld from public inspection.

Qwest considers this highly confidential information as being extremely competitively-sensitive in nature. This type of information is “not routinely available for public inspection” pursuant to both Federal Communications Commission (“Commission”) rules 47 C.F.R. §§ 0.457(d) and 0.459 (as Qwest explained and for which it provided legal justification in its Request for

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Confidential Treatment and Confidentiality Justification submitted with its four Petitions for Forbearance (including the one for the Seattle, Washington MSA) on April 27, 2007.

Qwest is simultaneously submitting, under separate covers, a non-redacted and a redacted version of the associated *ex parte*. The redacted version of the *ex parte* is marked **"REDACTED - FOR PUBLIC INSPECTION"**. Both the redacted and non-redacted versions of the *ex parte* are the same except that in the non-confidential version the highly confidential information has been omitted. This cover letter does not contain any confidential information.

If you have any questions concerning this submission, please call me on 303-383-6653.

Sincerely,

/s/ Daphne E. Butler

Attachment

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**Seattle MSA
Attachment 6**

Request 6: Qwest access line counts. By wire center and line type, provide a breakdown of Qwest MSA-level retail line counts filed by Qwest in support of its petition. For business lines and private line facilities, provide a further breakdown by capacity (DS0, DS1, DS3, OCN).

Response: Qwest is providing, by wire center and line type, its retail access line counts for the Seattle MSA as of December 2007. The business retail access lines have been further broken down by capacity. These are the detailed data underlying the MSA-level retail access line counts for December 2007 reported by Qwest in its *ex parte* filing of March 5, 2008.

Qwest is also providing, by wire center and capacity, the number of retail private line facilities in service in the Seattle MSA as of December 2007. Qwest's retail private line data has not previously been filed in this docket, either in its original petition or in the above-referenced *ex parte* filing.

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**Qwest Retail Access Lines in Service as of December 2007
Seattle MSA**

*****BEGIN HIGHLY CONFIDENTIAL*****

Wire Center	CLLI Code	Residence Lines	Business Lines Provided via DS0	Business Lines Provided via DS1	Total Business Lines	Public Lines	Total Qwest Retail Access Lines
		A	B	C	D = B + C	E	A + D + E
AUBURN	AUBNWA01						
BELLEVUE GLENCOURT	BLLVWAGL						
BELLEVUE SHERWOOD	BLLVWASH						
BLACK DIAMOND	BDMDWA01						
DES MOINES	DESMWA01						
ENUMCLAW	ENMCWA01						
FEDERAL WAY	FDWYWA01						
ISSAQUAH	ISQHWAEX						
KENT MERIDIAN	KENTWAME						
KENT O'BRIEN	KENTWAOB						
KENT ULRICK	KENTWA01						
MAPLE VALLEY	MPVYWAMV						
MERCER ISLAND	MRISWA01						
RENTON	RNTNWA01						
SEATTLE ATWATER	STTLWA05						
SEATTLE CAMPUS	STTLWACA						
SEATTLE CHERRY	STTLWACH						
SEATTLE DUMWAMISH	STTLWADU						
SEATTLE EAST	STTLWA03						
SEATTLE ELLIOTT	STTLWAEI						
SEATTLE EMERSON	STTLWA04						
SEATTLE LAKEVIEW	STTLWALA						
SEATTLE MAIN	STTLWA06						
SEATTLE PARKWAY	STTLWAPA						

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SEATTLE SUNSET	STTLWASU						
SEATTLE WEST	STTLWAVE						
Seattle MSA Totals							

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**Qwest Retail Private Line Facilities in Service as of December 2007
Seattle MSA**

Wire Center	CLLI Code	Analog Private Line	DS0	DS1	DS3	OC-3	OC-12	OC-48	Total Retail Private Line Facilities
AUBURN	AUBNWA01								
BELLEVUE GLENCOURT	BLLVWAGL								
BELLEVUE SHERWOOD	BLLVWASH								
BLACK DIAMOND	BDMDWA01								
DES MOINES	DESMWA01								
ENUMCLAW	ENMCWA01								
FEDERAL WAY	FDWYWA01								
ISSAQUAH	ISQHWAEX								
KENT MERIDIAN	KENTWAME								
KENT O'BRIEN	KENTWAOB								
KENT ULRICK	KENTWA01								
MAPLE VALLEY	MPVYWAMV								
MERCER ISLAND	MRISWA01								
RENTON	RNTNWA01								
SEATTLE ATWATER	STTLWA05								
SEATTLE CAMPUS	STTLWACA								
SEATTLE CHERRY	STTLWACH								
SEATTLE DUMWAMISH	STTLWADU								
SEATTLE EAST	STTLWA03								
SEATTLE ELLIOTT	STTLWAEL								
SEATTLE EMERSON	STTLWA04								
SEATTLE LAKEVIEW	STTLWALA								
SEATTLE MAIN	STTLWA06								
SEATTLE PARKWAY	STTLWAPA								
SEATTLE SUNSET	STTLWASU								
SEATTLE WEST	STTLWAVE								
Seattle MSA Totals									

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*****END HIGHLY CONFIDENTIAL*****

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**Seattle MSA
Attachment 7**

Request 7: Provide an accounting, by CLEC name, of the UNEs and/or special access services being provided by Qwest to the CLECs in each wire center of each of the four MSAs. Provide the capacity of the services (*i.e.*, DS0, DS1, DS3, OCN).

Response: The data sought by this request cannot be fully provided on a CLEC-by-CLEC basis without a written subpoena. However, as agreed upon, the data is being provided at an MSA level, with CLEC names masked to protect specific CLEC identity. As a further means of maintaining CLEC confidentiality, line counts less than 10, as indicated by the presence of an asterisk, have been withheld.

The data being provided is as of December 2007, which is the same vintage as the data shown in the updated Highly Confidential Exhibit 2 provided by Qwest in its *ex parte* filing of March 5, 2008.

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Unbundled Network Elements ("UNE") in Service as of December 31, 2007¹
Seattle MSA

*****BEGIN HIGHLY CONFIDENTIAL*****

CLEC IDENTIFIER	UNE LOOP 2 WIRE	UNE LOOP DIG-2W	UNE LOOP DIG-ADSL	UNE LOOP 4 WIRE	UNE LOOP DIG-4W	UNE LOOP DIG-DS1	UNE LOOP DIG-DS3	UNE LOOP DIG-BRI	UNE LOOP DIG-XDSL

*****END HIGHLY CONFIDENTIAL*****

¹ NOTES:

- Entries marked with an asterisk denote a quantity of less than 10. Specific counts are being withheld to maintain confidentiality.
- Each CLEC Identifier represents the consolidated operations of that particular CLEC.
- DS1 and DS3 quantities shown are counts of the actual facilities in service, and not the voice grade equivalents that may potentially be provided over those facilities.

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Enhanced Extended Loops (“EELs”) in Service as of December 31, 2007²
Seattle MSA

*****BEGIN HIGHLY CONFIDENTIAL*****

CLEC IDENTIFIER	DS1

*****END HIGHLY CONFIDENTIAL*****

² NOTES:

- Entries marked with an asterisk denote a quantity of less than 10. Specific counts are being withheld to maintain confidentiality.
- Each CLEC Identifier represents the consolidated operations of that particular CLEC.
- DS1 quantities shown are counts of the actual facilities in service, and not the voice grade equivalents that may potentially be provided over those facilities.

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Answer: **False**

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*****END HIGHLY CONFIDENTIAL*****

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*****BEGIN HIGHLY CONFIDENTIAL*****

[illegible]

END HIGHLY CONFIDENTIAL

- Entries marked with an asterisk denote a quantity of less than 10. Specific counts are being withheld to maintain confidentiality.
- Each CLEC Identifier represents the consolidated operations of that particular CLEC.

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*****BEGIN HIGHLY CONFIDENTIAL*****

[illegible]

END HIGHLY CONFIDENTIAL

- Entries marked with an asterisk denote a quantity of less than 10. Specific counts are being withheld to maintain confidentiality.
- Each CLEC Identifier represents the consolidated operations of that particular CLEC.

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